Case 2:24-mj-30515-DUTY ECF No. 1 Page D.1 Filed 12/02/24 Page 1 of 6 (313) 226-9100

AO 91 (Rev. 11/11) Criminal Complaint Special Agent: Victor Mota Telephone: (313) 202-3400

# UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America v.

Raymon Tyrell Mattison

Case No. 24-30515

#### CRIMINAL COMPLAINT

I, the con	mplainant in this ca	se, state that	the following is tr	rue to the best of my knowled	ge and belief.	
On or about the date(s) of _		November 16, 2024		in the county of	Wayne	in the
Eastern	District of	Michigan	, the defenda	ant(s) violated:		
Code Section			Offense Description			
18 U.S.C. § 922 (g)(1)			Felon in Possession of a Firearm.			
This crir See attached affida	minal complaint is b	ased on these	e facts:			
see attached arriva						
✓ Continued o	on the attached shee	t.		Vistor V	yota	
				Complainant's		
				Victor Mota, Special Printed name		
Sworn to before me and signed in my preser and/or by reliable electronic means.  Date:		nce		11/1		
				Judge's signati	are	
City and state: Detroit, Michigan			<u>I</u>	Hon. David R. Grand, United States Magistrate Judge  Printed name and title		

#### AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Victor A. Mota, being sworn, depose and state the following:

## **INTRODUCTION**

- 1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and have been so employed since March 2020. I am currently assigned to the Detroit Field Division, group VII. I am tasked with investigating violations of firearms and narcotics laws. Prior to becoming a Special Agent with the ATF, I was an Officer with the United States Customs and Border Protection Office of Field Operations for ten years as well as a supervisor for about two years. I completed the United States Customs and Border Protection Basic course, the Criminal Investigator Training Program, and the ATF Special Agent Basic Training at the Federal Law Enforcement Training Center in Brunswick, Georgia. I obtained a Bachelor of Science degree in Criminal Justice from Wayne State University.
- 2. During my employment with ATF, I have participated in criminal investigations focused on firearms, armed drug trafficking violations, and criminal street gangs. Through these investigations, my training and experience, and conversations with other agents and law enforcement personnel, I have become familiar with firearms violations.
- 3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other officers and witnesses. This affidavit is intended to show merely that there is sufficient

Case 2:24-mj-30515-DUTY ECF No. 1, PageID.3 Filed 12/02/24 Page 3 of 6 probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. This affidavit is made in support of a criminal complaint for Raymon Tyrell MATTISON. Probable cause exists that MATTISON knew he was a convicted felon and knowingly possessed a firearm, in violation of 18 U.S.C. § 922(g)(1).

## PROBABLE CAUSE

- 5. On November 16, 2024, at approximately 10:03 pm, Detroit Police Department officers were traveling south on Linwood Street near Fenkell Ave. in the Eastern District of Michigan. Officers observed a white Chrysler 300 traveling north on Linwood Street and noticed the vehicle had an inoperable right headlight. As the vehicle passed the officers, they noticed that its license plate lights were also not working. Officers made a U-turn and ran the vehicle's plate through LEIN which showed that the car was not insured. Officers then conducted a traffic stop.
- 6. Officers approached the vehicle and identified MATTISON as the driver and sole occupant of the vehicle. Officers ran MATTISON through LEIN and discovered he had a traffic warrant. While one officer was running MATTISON through LEIN, Officer Jackson noticed MATTISON drop his hands to the steering wheel and then raise them again. Based on Officer Jackson's training and experience, this movement is consistent with attempting to conceal contraband.

- 7. Officers asked MATTISON if there were any firearms in the vehicle to which he replied, "No." Officers asked MATTISON for consent to search his vehicle and he gave consent. Officers had MATTISON step out of the vehicle and conducted a search. Officer Jackson inspected the steering column of the vehicle and located a tear in the leather. Officer Jackson reached into the tear and found a Glock Model 26 Gen 5, 9mm pistol, serial number: AKBE341 (the Glock Pistol). Officers confirmed that MATTISON did not have a valid CPL through LEIN.
- 8. Officers arrested MATTISON for carrying a concealed weapon and impounded the Chrysler 300.
- 9. I spoke with ATF Special Agent Matthew Totten, a firearms interstate nexus expert, and gave him a description of the Glock Pistol. SA Totten told me that, based on his training and experience, the Glock Pistol meets the federal definition of a firearm, was manufactured outside the State of Michigan, and therefore traveled in interstate and/or foreign commerce.
- 10. I reviewed MATTISON's criminal history and determined he has the following felony convictions:
  - a. On August 29, 2016, MATTISON pled guilty to one count of
     Conspiracy Felony Bank Robbery and one Count of Felony Bank
     Robbery in the Sixth Circuit Court in Oakland County.
     MATTISON was sentenced to 365 days in jail and 3 years'
     probation.

- b. On July 28, 2018, MATTISON pled guilty to one count of federal bank robbery. He was sentenced on November 16, 2018, to 4 years in prison and 2 years of supervised release. MATTISON was discharged from supervised release in September 2024.
- 11. Because MATTISON spent 4 years in prison and recently was discharged from federal supervised release, it is reasonable to infer that he knew he had been convicted of a felony at the time he possessed the Glock Pistol.

#### **CONCLUSION**

12. Based on the above facts, there is probable cause to believe that on November 16, 2024, while in the Eastern District of Michigan, Raymon Tyrell MATTISON, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, possessed a Glock Model 26 Gen 5, 9mm pistol, in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,

Special Agent Victor Mota Bureau of Alcohol, Tobacco, Firearms, and Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means.

Hon. David R. Grand

United States Magistrate Judge

Date: December 2, 2024